

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-MJ-03414-Elfenbein

UNITED STATES OF AMERICA

v.

VERNON GREEN,  
Defendant.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
4. Did this matter involve the participation of or consultation now Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

By:



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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

Vernon Green,

*Defendant.*

Case No. 24-MJ-03414-Elfenbein

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of on or about June 21-23, 2024 in the county of Miami-Dade in the  
Southern District of Florida, the defendant(s) violated:

*Code Section*

18 U.S.C. § 2261A  
18 U.S.C. § 924(c)(1)(A)

*Offense Description*

Stalking  
Use of a Firearm in furtherance of a crime of violence

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.



Badge 10072

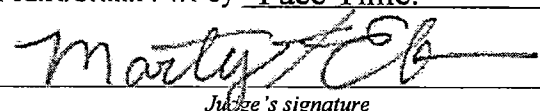
*Complainant's signature*

Conor Goepel, Special Agent FBI

*Printed name and title*

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Face Time.

Date: 7/13/2024



*Judge's signature*

City and state: Miami, Florida

Hon. Marty Fulgueira Elfenbein, United States Magistrate Judge  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

Your Affiant, Conor S. Goepel, being duly sworn, deposes and states as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent for the Federal Bureau of Investigation ("FBI") currently assigned to the Violent Crimes/Fugitive Task Force in the Miami Division. I have been an FBI Special Agent since September 2021 and have been assigned to the Miami Division since February 2022. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations of, and to make arrests for, federal offenses. As a Special Agent for the FBI, my duties involve the investigation of a variety of violations of federal offenses, including, but not limited to, bank robberies, Hobbs Act robberies, extortion, and murder for hire.

2. I am currently a member of the South Florida Violent Crime Task Force. As part of my professional duties and responsibilities, I have become familiar with the investigative methods and enforcement of violent crimes pertaining to state and federal laws. I have also become versed in methodologies and practices employed by individuals and groups who commit violent crimes.

3. The facts contained in this Affidavit are based on my personal knowledge and information provided to me by other law enforcement officers. This Affidavit is being submitted for the limited purpose of establishing probable cause for the proposed complaint, and as such does not contain every fact known to me. I respectfully submit that based upon the facts presented below, that there is probable cause to believe that Vernon GREEN committed the offenses of interstate stalking, in Violation of Title 18, United States Code, Section 2261A(2) and use of a firearm in furtherance of a crime of violence, in violation of Title 18, United States Code, Section 924(c).

**PROBABLE CAUSE**

***Background***

4. Since July of 2022, several law enforcement agencies have been assisting in the investigation of a series of events that targeted VICTIM 1, a resident of Miami-Dade County, and her sister. These events include an apparent poisoning, two separate vehicle arsons at VICTIM 1's sister's residence in Miami, a hit and run at VICTIM 1's residence in Pinecrest, Florida (hereinafter, "VICTIM 1's Residence"), and the mailing of a threatening letter to VICTIM 1 all occurring between as early as 2019 and through on or about September 26, 2023.

5. Specifically, as to the hit and run that occurred at VICTIM 1's Residence on August 30, 2023, law enforcement responded after a Home Depot rental truck rammed into the side of a vehicle operated by VICTIM 1 and then fled the scene. The incident was captured on VICTIM 1's home video surveillance system. The investigation revealed that the Home Depot truck was rented at the Coconut Grove Home Depot in Miami-Dade County, where Edner ETIENNE exited a truck registered to Michael DULFO and drove the Home Depot truck out of the parking lot. License Plate Reader data revealed that DULFO's truck followed VICTIM 1's vehicle as she left downtown Miami from a court hearing involving her divorce proceeding from her estranged husband, Sergio PINO.

6. In addition to DULFO and ETIENNE, the investigation revealed that DULFO was communicating with Jerren HOWARD and Bayron BENNETT. ENNETT, DULFO, HOWARD, and ETIENNE were originally charged by complaint, Case Numbers 24-mj-02454-LMR and 24-mj-02460-LMR, and later indicted for Stalking, Arson, and Use of an Interstate Facility in Aid of Racketeering, in Case Number 24-CR-20110-GAYLES.

*The Assault with a Firearm: June 23, 2024*

7. On June 23, 2024, at approximately 8:45 am, VICTIM 1, departed her residence in her vehicle. At approximately 11:30 am, VICTIM 1 returned to her residence and momentarily idled in her driveway while she waited for the gate on the west side of the house to open. As VICTIM 1 began to pull into the driveway, she observed a black male individual (later identified by law enforcement as Vernon Green ("GREEN")), brandishing a firearm and running toward her vehicle. In fear for her safety, and in an attempt to get away, VICTIM 1 drove into her backyard, scraping the sides of her car against a tree and a fence. VICTIM 1 continuously honked the horn of her car as she attempted to get away. GREEN pursued her vehicle by foot and ran into the backyard before he turned around and ran back toward the front of VICTIM 1's Residence.

8. During this time, VICTIM 1's daughter, VICTIM 2, was inside VICTIM 1's Residence when she heard a loud crash and a vehicle honking. VICTIM 2 exited the west door of VICTIM 1's Residence and ran toward the front of the house. As she reached the open gate, VICTIM 2 noticed a black pickup truck parked on the street. GREEN, coming from the back of the house, ran up behind VICTIM 2 and pointed a firearm at VICTIM 2's head. Upon GREEN's approach, VICTIM 2 turned around and saw GREEN as he pointed a silver pistol inches from her face. GREEN grabbed VICTIM 2's arm and told her to go back into the house. VICTIM 2 then ran back toward the exit she came from.

9. After VICTIM 2 fled, GREEN ran across the front yard of VICTIM 1's Residence toward the east side of the property. Moments later, GREEN turned back, ran across the yard, and entered the back passenger side of a black Dodge Ram pickup truck (the "Dodge Ram"). The Dodge Ram then rapidly departed the vicinity, which reasonably indicates there was an additional individual, SUBJECT 2, acting as the getaway driver.

10. VICTIM 1's Residence is equipped with surveillance cameras affixed around the property that captured the incident. The video footage shows: VICTIM 1 arriving at her residence and waiting for the gate to open; the Dodge Ram as it arrives and stops on the street next to VICTIM 1's Residence;

GREEN, wearing a light-colored t-shirt, shorts, yellow-colored boots, a beanie, and a face covering, exiting the Dodge Ram's back passenger side and running up to the VICTIM 1; and GREEN holding what appears to be a firearm in his right hand. The surveillance footage also shows: VICTIM 1 driving her vehicle toward the backyard, and GREEN pursuing her on foot; VICTIM 2 as she exits the residence; and GREEN approaching VICTIM 2 from behind, pointing a firearm at her head, and grabbing her arm.

11. Law enforcement canvassed VICTIM 1's neighborhood and obtained video surveillance footage showing that on June 23, 2024, at approximately 8:46 am, the Dodge Ram arrived and parked on the north side of SW 96 Street, approximately one block east of VICTIM 1's Residence. The Dodge Ram followed closely behind a white Tesla (the "Tesla"), which continued west on SW 96th Street, passing VICTIM 1's Residence. The video shows that less than two minutes later, the Tesla traveled east on SW 96th Street, passing VICTIM 1's Residence. The Tesla then continued east, passing the Dodge Ram, which then immediately departed and followed closely behind the white Tesla as they both turned north on SW 67th Avenue. The video shows that at approximately 8:56 am, the Dodge Ram returned to the same spot where it had previously parked and did not depart until approximately 11:30 am, when VICTIM 1 returned to her residence.

12. In my training and experience, it is not uncommon for criminals to use multiple cars to commit crimes. In this case, the close proximity of the white Tesla to the Dodge Ram over time, distance, and change of direction indicates a direct relationship between the occupants of the Dodge Ram and the white Tesla.

#### ***Identification and Movement of Vehicles***

13. A further analysis of surveillance video obtained in the vicinity of VICTIM 1's Residence disclosed the Florida license plate DI0RI affixed to the rear of the Tesla. Information obtained from the Florida Department of Highway Safety and Motor Vehicles, driver and vehicle information database ("DAVID") discloses that the license plate DI0RI is registered to Diori BARNARD. A database search showed BARNARD's registered residential address to be located at 2427 NW 131 Circle, Miami, Florida.

BARNARD is currently charged by criminal complaint with violations of federal law including, possession of more than 50 grams of methamphetamine and a detectable amount of cocaine, possession of a firearm in furtherance of a drug trafficking crime, and felon in possession of a firearm. See 24-mj-03234- Reid.

14. On June 24, 2024, law enforcement conducted surveillance of BARNARD's residence. Parked outside the house was a white Chevrolet Tahoe, bearing Florida license plate BN5 0WL. A DAVID query revealed the Tahoe is registered to BARNARD. Upon reviewing license plate reader ("LPR") images, on May 3, 2024, an LPR collected an image of BARNARD's residence that captured the white Tahoe next to a black Dodge Ram with chrome bumpers, similar in description to the Dodge Ram seen around VICTIM 1's Residence on June 23, 2024. In this image, an after-market LED light is visible on the Dodge Ram's front bumper.

15. The afternoon of June 24, 2024, FBI surveillance recovered the Dodge Ram, with Florida license plate BP16UV, abandoned in the vicinity of SW 70th Avenue and SW 80th Street nearby VICTIM 1's Residence. Law enforcement observed an after-market LED light affixed to the Dodge Ram's front bumper, in the same place as the one seen on the Dodge Ram at BARNARD's residence. The vehicle identification number ("VIN") associated with the Dodge Ram, 1C6RRBEG1MN533057, is reported stolen. Based on my training and experience, perpetrators of violent crimes often use a stolen vehicle to commit the crime, and an additional vehicle, in this case the white Tesla, to attempt to avoid detection and escape the scene of the crime.

16. Law enforcement queried for stolen vehicles and received an Orange County Sheriff's Department (FL) report stating that the Dodge Ram was stolen in the vicinity of Orlando, FL, in the early morning hours of March 31, 2024. Also contained in that report, S.H., the owner of the Dodge Ram, stated the vehicle can be differentiated from similar models, by an LED strobe light affixed to the front bumper.

17. Florida License Plate BP16UV, also reported stolen, is associated with a 2013 orange Toyota Corolla.<sup>1</sup> Law enforcement located and interviewed, "A.O.," the owner associated with Florida tag BP16UV. Upon locating A.O., his vehicle, a blue Dodge Ram, was parked in the lot with Florida license plate 85BMPA affixed to the rear. A.O. acknowledged the current plate on his truck was not his and he had no knowledge of how that plate got on his vehicle. A.O. told law enforcement that he had recently visited a Walmart. Law enforcement photographed and seized the plate for processing. In my training and experience, perpetrators of crimes involving vehicles will try to avoid detection by using stolen vehicles and switching the license plate affixed to a vehicle used for criminal purposes to conceal the vehicle's identity.

18. An LPR review of Florida plate 85BMPA revealed that on June 19, 2024, at 8:41 pm, A.O.'s blue Dodge Ram was parked at a Walmart in Miami, Florida. An LPR review also documented a Mazda C-30, parked in the same Walmart at 8:42 pm. A review of the Walmart surveillance footage showed the white Tesla driving with the Mazda C-30 and pulling up to the blue Dodge Ram. Based on the driving pattern, parking location, and time spent in the parking lot without entering the store, it is reasonable to believe that the occupants of the white Tesla and occupants of the Mazda C-30 worked together to steal a license plate off of a similar make, model, and color vehicle in order to place the mis-attributable license plate on the Dodge Ram.

19. On June 24, 2024, FBI located and seized the white Tesla with the license plate "DI0RI" affixed to the rear of the vehicle. A federal search warrant (24-mj-03231-Reid) was obtained, and on June 25, 2024, law enforcement extracted footage recorded by the Tesla's onboard computer system, which included multiple cameras capturing exterior footage. Footage from June 8, 2024, revealed the white Tesla parked in the driveway of BARNARD's residence.

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<sup>1</sup> It should be noted that during the interview of the owners of the blue Dodge Ram and orange Toyota Corolla, it was discovered that they have two license plates (BP16UV and BP13UV) that were improperly affixed to their vehicles.



Parked next to the Tesla was a black Dodge Ram with chrome accents and black rims, matching the description of the Dodge Ram. The white Tesla footage showed JOHNSON as he was in and out of the passenger side of the Dodge Ram. Footage from June 20, 2024, at approximately 2:30 pm, revealed JOHNSON entering the driver's side and departing in a light-colored Mazda C-30.

***Johnson's Telephone Number and the Mazda C-30***

20. As early as February 2024, and as recent as Friday, June 28, 2024, JOHNSON has been in contact with law enforcement using a cellular device assigned telephone number 448-207-5007. During these contacts, JOHNSON calls and messages on different days and different times of the day. JOHNSON has expressed that if law enforcement wishes to contact him, they should do so using the 448-207-5007 telephone number. Based on JOHNSON's contact with law enforcement over the past several months using telephone number 448-207-5007, I believe he is the owner and user of the device.

21. Seminole Hard Rock Casino ("Hard Rock Casino") advised law enforcement that JOHNSON has an active player account with the casino. Further, surveillance footage from Hard Rock Casino shows that on June 21, 2024, at 8:40 am. JOHNSON arrived alone in a light-colored Mazda C-30, bearing Florida license plate 95BKCV (the "Mazda C-30"). The Mazda C-30's VIN is 3MVDMBDM1RM648633 and is the vehicle is registered to P.V. Holding Corp, a car rental company. The Hard Rock Casino surveillance footage also shows that JOHNSON departed the casino as the driver and sole occupant of the Mazda C-30.

22. Records check at P.V. Holding Corp, revealed Mazda C-30 was rented on June 14, 2024, to Diori BARNARD. This vehicle was scheduled to be returned on June 21, 2024, but was not returned until June 28, 2024

23. A review of LPR database checks for the Mazda C-30 license plate revealed its location on June 21, 2024, at 7:56:52 pm, in the vicinity of 6731 Killian Drive, Pinecrest, Florida.

The Mazda C-30 was immediately behind the stolen Dodge Ram which hit the LPR at 7:56:57 pm. This location is approximately 1.3 miles south of VICTIM 1's Residence.

24. Additional LPR records indicate that on June 22, 2024, the Mazda C-30 is recorded by the Monroe County Sheriff's Office, Key Largo South LPR, located immediately over the Route 1 bridge onto Key Largo. In an interview with VICTIM 1, law enforcement learned that she was in Key Largo on the evening of June 22, 2024, with a reservation to stay at Baker's Cay Resort ("Resort"). On June 28, 2024, pursuant to a federal search warrant of the Dodge Ram (Case No. 24-mj-03262-Reid) law enforcement searched the Dodge Ram and recovered a Resort valet pass with an arrival date of June 22, 2024, and a departure date of June 26, 2024.<sup>2</sup> Law enforcement reviewed security footage provided by the Resort and observed the Dodge Ram and BARNARD's white Tahoe follow VICTIM 1 into the Resort's parking area through the Resort's front gate.

25. On June 28, 2024, pursuant to a federal search warrant (Case No. 24-mj-03261-Reid), law enforcement obtained BARNARD's historical cell site data from his provider. Upon review of these records, law enforcement learned that BARNARD called JOHNSON on the evening of June 22, 2024, while in the vicinity of VICTIM 1's Residence. On June 23, 2024, prior to driving the white Tesla to VICTIM 1's Residence, BARNARD contacted JOHNSON. BARNARD again contacted JOHNSON upon the white Tesla and the Dodge Ram's arrival outside of VICTIM 1's Residence. JOHNSON, BARNARD, and additional unidentified phone numbers<sup>3</sup> then appear to join a group phone call shortly thereafter while the Dodge Ram and the white Tesla are down the street from VICTIM 1's Residence. I believe that the timing of this phone call in conjunction with the sequence of events as observed on residential surveillance

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<sup>2</sup> During an interview with Resort employees, law enforcement learned that in order to obtain a Resort valet pass with an arrival and departure date one must have an existing reservation with the Resort. A subpoena for Resort records is pending, however, the hotel at first review was unable to find a reservation associated with the valet pass in question.

<sup>3</sup> A subpoena is pending with the carrier to identify these numbers.

footage indicates that the individuals inside the vehicles were coordinating their eventual attack on VICTIM 1.

26. Pursuant to a federal search warrant (24-mj-03291-Reid) for historical cell site data associated with the cellular device assigned telephone number 448-207-5007 (JOHNSON's number), law enforcement plotted relevant dates and times of interest (June 22 and 23, 2024) which revealed the cellular device was connecting to cell phone towers in the vicinity of VICTIM 1's Residence, Calvary Chapel Miami, and the Resort.

27. On June 22, 2024, between approximately 7:55 p.m. and 8:50 p.m., cellular device assigned telephone number 448-207-5007 utilized cellphone towers in the vicinity of Homestead, Florida. During this time there were six phone calls between 448-207-5007 and BARNARD. Between approximately 9:29 p.m. and 9:44 p.m., cellular device assigned telephone number 448-207-5007 utilized cellphone towers in the vicinity of the Resort in Key Largo, Florida. Upon arriving in the vicinity of the Resort, cellular device assigned telephone number 448-207-5007 received a phone call from BARNARD.

28. On June 23, 2024, at approximately 6:43 a.m., 6:59 a.m., 7:35 a.m., and again at 8:36 a.m. the cellular device connected to cellular towers in the vicinity of VICTIM 1's Residence. Of these connections, four are telephone calls all of which are with BARNARD. At approximately 8:58 a.m. cellular device assigned telephone number 448-207-5007, utilizes a cellular tower north of VICTIM 1's Residence and then at approximately 9:10 a.m. it utilizes a cellular tower in the vicinity of Calvary Chapel Miami, a church where the victim was located that morning. Calvary Chapel Miami is more than 10 miles away from VICTIM 1's Residence. Between 10:03 a.m. and 10:30 a.m., while in the vicinity of Calvary Chapel Miami, the cellular device communicates with BARNARD. The cellular device remained in the area of Calvary Chapel Miami until approximately 10:45 a.m. which is consistent with VICTIM 1's location.

29. In my training and experience, it is common for individuals engaged in criminal activity involving multiple coconspirators to use cellular devices to coordinate their criminal activity while mobile. Specifically, like in this case, where there are individuals in multiple vehicles, it is reasonable to believe that they are communicating with one another to coordinate their efforts using cellular devices. Based on the consistent pattern of telephonic communication, while in close proximity to one another, and VICTIM 1, it is reasonable to believe that BARNARD and JOHNSON spent June 21, 22, and 23 stalking VICTIM 1 in an effort to find an opportunity to commit a crime of violence with a firearm, as indicated by the events that took place outside VICTIM 1's Residence on the morning of June 23, 2024.

*Arrest of JOHNSON, Identification of GREEN*

30. On or about July 1, 2024, JOHNSON was arrested by law enforcement in Clay County, Florida pursuant to a criminal complaint. *See* 24-mj-03324-Goodman. JOHNSON waived his *Miranda* rights and provided a statement. In that statement JOHNSON revealed that he recruited several individuals, to include BARNARD, and his cousin Vernon GREEN, DOB: July 10, 1971, for a contract to kill VICTIM 1. During the interview, law enforcement showed JOHNSON a still photograph from VICTIM 1's residence surveillance system during the June 23, 2024, incident. The photograph shown to JOHNSON depicts the armed individual holding a firearm pointed at VICTIM 2. JOHNSON identified the gunman from the photograph as GREEN. Additionally, during JOHNSON's statement, JOHNSON confirmed that GREEN was a passenger in the Dodge Ram truck while the hired coconspirators stalked VICTIM 1 to Key Largo on June 22, 2024.

31. Law enforcement determined that phone number 786-507-9306 is associated with a Cashapp account with the vanity name "Vernon Green.". A review of BARNARD and this

phone number's call history on June 23, 2024, revealed BARNARD communicated with the phone number approximately 22 times, 15 of which were phone calls. It is reasonable to believe that 786-507-9306 is associated with GREEN. A review of call detail records show that BARNARD, JOHNSON, GREEN, and additional coconspirators used their phones to communicate and coordinate their efforts during the time periods in which they stalked VICTIM 1.

32. An analysis of GREEN's historical cell site records supports JOHNSON's statement, in that GREEN's phone was located in the vicinity of VICTIM 1's residence on June 23, 2024, as well as the location in which the black Dodge Ram was abandoned on a nearby street. Additionally, on June 22, 2024, GREEN's device is located in the vicinity of VICTIM 1's residence from 3:13 p.m. to 6:25 p.m., Bakers Cay Resort during the time in which VICTIM 1 was also there eating dinner, and then again at VICTIM 1's residence around 9:53 p.m. GREEN's device was also near VICTIM 1's residence on June 11, 2024, at 7:20 p.m.

33. After JOHNSON's post *Miranda* statement, law enforcement identified that GREEN was staying at a shelter in the Wynwood area in Miami, Florida. Over the course of several days, law enforcement confirmed that GREEN was consistently checking in and out of the shelter each day.

34. On July 12, 2024, law enforcement approached GREEN at the shelter and arrested him for his involvement in the above-described crimes. GREEN was arrested with minimal personal effects on his body and requested that law enforcement transport his personal items<sup>4</sup> from the shelter to the FBI Miami Office.

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<sup>4</sup> Personal items were photographed prior to transport in GREEN's locker. These items included clothing, shoes, miscellaneous items, and medication. GREEN told law enforcement that there were no valuable items included in his personal effects.

35. Law enforcement transported GREEN to the FBI Miami where he gave a statement after waiving his *Miranda* rights. In conjunction with waiving his *Miranda* rights, GREEN also provided written consent for law enforcement to search his belongings. During the interview, GREEN was shown a photograph of the gunman from VICTIM 1's surveillance footage from the June 23, 2024; assault and confirmed he was the individual pictured with the firearm.

36. Law enforcement searched GREEN's personal belongings and recovered a pair of Timberland boots and green shorts resembling the ones worn by GREEN during the June 23, 2024, assault at VICTIM 1's Residence.

### CONCLUSION

37. Based upon the foregoing, I submit that there is probable cause for the proposed complaint charging GREEN with the offenses of interstate stalking, in Violation of Title 18, United States Code, Section 2261A and use of a firearm in furtherance of a crime of violence, in violation of Title 18, United States Code, Section 924(c).

FURTHER AFFIANT SAYATH NAUGHT.



Badge 10072

CONOR GOEPEL  
SPECIAL AGENT  
FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1  
by Face Time this 13th day of July 2024.



HONORABLE MARTY FULGUEIRA ELFENBEIN  
UNITED STATES MAGISTRATE JUDGE